



PORTER & KORVICK
TRIAL LAWYERS

December 28, 2015

VIA ECF ONLY

Honorable Laura Taylor Swain
U.S. District Judge, Southern District of New York
500 Pearl Street, Courtroom 12D
New York, NY 10007

Re: John Doe vs. ELN and FARC et al
SDNY Case No. 15-cv-08652-LTS
Motion for 20 day extension of time

Dear Judge Swain:

Undersigned counsel for Third Party Respondents Keith Stansell, Marc Gonsalves, Thomas Howes, Judith Janis, Christopher Janis, Michael Janis, Greer Janis and Jonathan Janis hereby request a 20 day extension of time within which to file their Answer to the JPMorgan Chase Bank, N.A. Third Party Complaint [DE 11] in Interpleader.

The Stansell Respondents' motion to transfer or dismiss was denied by Order entered on December 16, 2015, making the Answer **currently due on December 30, 2015**. Stansell Respondents request an **additional 20 days to Answer or on or before January 19, 2015**.

The parties expect a ruling shortly from Judge Feinerman in the NDIL on the pending motions for 1404(a) transfer of the Stansell turnover motions to the SDNY, and those rulings will impact the Stansells' Answer to the interpleader here.

Further, the deadline for JPMCB to deposit the blocked funds into the Court registry is January 13, 2015. There will be no prejudice to any party because the interpleader is not yet at issue with respect to other respondents who have not yet appeared or been defaulted.

The undersigned has conferred with opposing counsel for John Doe, JPMCB and ALICO who have no objection to the requested extension of time, but I have not yet been able to determine whether or not Kassim Tajeddine opposes the requested extension of time.

Thank you for the Court's consideration.

Respectfully,

/s/ TONY KORVICK

Cc: All counsel of record (via ECF)